DRAFT PERMIT FACT SHEET

AMEREN'S LABADIE PLANT is the largest coal-fired power plant in Missouri and one of the largest in the country. The plant, built in 1970, discharges over a billion gallons of polluted water daily from eight separate outlets, or outfalls. The Missouri Department of Natural Resources ("MDNR") regulates the plant's water pollution through a National Pollutant Discharge Elimination System ("NPDES") Permit. The plant is operating under an NPDES permit that was last issued in 1994 and expired in 1999.

On January 2, 2015, MDNR released a draft revised permit for public comment. This draft permit has several critical deficiencies, which allow Ameren to continue polluting the Missouri River and surrounding environment. Comments on the draft permit are due to MDNR on March 3, 2015.

KEY DEFECTS IN THE DRAFT PERMIT

Coal Ash Ponds Do Not Have Effluent Limits on Toxic Metals

- The Labadie plant has two ash ponds, one lined and one unlined. The unlined ash pond was constructed in 1970 with a surface area of 154 acres. The lined ash pond was constructed in 1993 with a surface area of 79 acres. The power plant produces over 500 thousand tons of ash every year.
- The wastewater in the ash ponds is only treated for pH and then discharged into the river at a rate of about 16 million gallons per day. Coal ash contains heavy metals and other contaminants that pose a threat to humans and the environment.
- MDNR is required to set permit limits for toxics in the ash pond discharge based on the "best technology economically achievable." The draft permit, however, requires only monitoring, with no discharge limits on toxic metals.

Groundwater Monitoring at the Coal Ash Ponds Is Insufficient

- Although Ameren reported to DNR in 1992 that the unlined ash pond was leaking about 50 thousand gallons of wastewater per day, the 1994 permit did not require Ameren to conduct any groundwater monitoring.
- Other states (including Illinois) have required power plants to monitor groundwater at their ash ponds, but MDNR has not yet required Ameren to monitor the groundwater at the plant's ash ponds.
- The draft permit includes groundwater monitoring requirements, but they are weaker than the requirements in new EPA coal ash regulations.
    - The draft permit requires groundwater monitoring only at the unlined pond, but the EPA regulations require monitoring at both lined and unlined ash ponds.
    - The draft permit does not require Ameren to start groundwater monitoring until 3 years after the revised permit is ultimately issued, but the EPA regulations require groundwater monitoring to commence much earlier.

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Thermal Discharge Is Unregulated

- The Labadie plant discharges on average over a billion gallons of hot water every day. Ameren has a variance that allows the thermal discharge to contain as much heat as the plant generates, without any meaningful limit.
- Despite the absence of current aquatic studies required by law, the draft permit allows Ameren to continue the variance for at least another 10 years.
- The endangered pallid sturgeon is present in the area, and young sturgeon are threatened by high-temperature water such as the plant's thermal discharge.

Cooling Water Intake Structure Harms Aquatic Life

- The Labadie plant removes more than 1 billion gallons of water each day from the Missouri River, heats it by about 20-25°F, and then discharges the heated water into the River. (The plant also adds some River water to coal ash to transport it from the plant to the ash ponds.) The plant currently uses a once-through cooling system that has not been updated since the 1970s.
- The intake structure kills aquatic life by trapping fish against the intake screens and sucking in smaller aquatic life.
- The 2015 draft permit requires Ameren to conduct studies that could lead to upgrades to the cooling water intake structure to comply with new EPA regulations. No plant upgrades are required until the next permit is issued – at least another 5 years from now.

Limits are Removed and Monitoring is Reduced for Stormwater Discharges

- The permit allows Ameren to discharge stormwater from six locations at the outfalls into the Missouri River. Stormwater can be contaminated by contact with coal, coal ash, and other pollutants on the site.
- The draft permit removes all of the pollution limits and monitoring requirements for two of the outfalls.
- Despite Ameren's past stormwater violations, the draft permit removes discharge limits and replaces them with dubiously-enforceable benchmarks, relying on Ameren to police itself.
    - In the past, if Ameren exceeded a limit, it violated the permit. Under the draft permit, if Ameren exceeds a benchmark it is only required to review its internal management practices. The facility only violates the permit if its efforts are not sufficient, and it continues to exceed the benchmark.
- The draft permit also reduces the monitoring requirements for the four remaining outfalls from quarterly to just twice per year.